

# JacksonLewis

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*PRIVILEGED AND CONFIDENTIAL  
VIA EMAIL*

May 4, 2022

## VIA ECF

Hon. Paul A. Engelmayer, U.S.D.J.  
United States District Court  
Southern District of New York  
40 Foley Square, Room 2201  
New York, New York 10007

Re: **Rajeev Munjal v. Emirates**  
**Civil No.: 21-CV-08401 (PAE)**

Dear Judge Engelmayer:

We represent Defendant Emirates (hereinafter referred to as "Defendant") in connection with the above-referenced matter. We write with Plaintiff counsel's consent to respectfully request a brief extension of the deadline to complete fact discovery from May 31, 2022 through and including June 10, 2022. This is the second request for an extension of the fact discovery deadline. The Court granted in part and denied in part the Parties' first joint request for an extension of the original fact discovery end date of April 18, 2022. The reasons for this brief extension are explained below.

Defendant is completing its production of thousands of pages of electronically stored information and expects production to be completed no later than May 13<sup>th</sup>. Emirates' offices have been closed since May 2<sup>nd</sup> for the end of Ramadan and the Muslim holiday of Eid al-Fitr. It re-opens next week. The Parties tentatively have scheduled the depositions of Plaintiff and two of the alleged decision-makers, both based in Dubai, during the week of May 23, 2022. The parties selected these dates to permit adequate review of Defendant's supplemental production. In addition to those witnesses, Plaintiff noticed the deposition of six additional witnesses, three of whom are based in New York, two in Dubai, and one in the United Kingdom. Given the 8-hour time difference between New York and Dubai and difficulties posed by such opposite schedules, Defendant is coordinating the travel of these non-US based witnesses to New York to sit for their respective depositions.

Accordingly, we respectfully request that the fact discovery deadline be extended through and including June 10, 2022 to enable the Parties to complete documentary discovery and schedule and complete nine depositions with witnesses located throughout the world.

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We thank the Court for its consideration of this request.

Respectfully submitted,  
JACKSON LEWIS P.C.

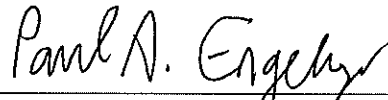
/s/ John J. Porta  
John J. Porta

JJP:lcp

cc: David N. Mair (via ECF)  
Gregory S. Slotnick (via ECF)

4886-8618-9854, v. 2

Granted. The parties are reminded of the possibility of remote depositions to avoid the need for international travel. The case management conference previously scheduled for June 28, 2022 at 9:30 a.m. is hereby adjourned until July 15, 2022 at 11:30 a.m. SO ORDERED.

  
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PAUL A. ENGELMAYER  
United States District Judge  
5/4/22